



**PRELIMINARY ASSESSMENT/  
VISUAL SITE INSPECTION**

**BELL SPORTS, INC.  
(FORMER VETTER FAIRINGS COMPANY)  
RANTOUL, ILLINOIS  
ILD 075 611 525**

**FINAL REPORT**

**Prepared for**

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
Office of Waste Programs Enforcement  
Washington, DC 20460**

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### Attachment

- A EPA PRELIMINARY ASSESSMENT FORM 2070-12
- B VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
- C VISUAL SITE INSPECTION FIELD NOTES
- D PART A PERMIT APPLICATION

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# EXECUTIVE SUMMARY

Dynamac Corporation (Dynamac) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Bell Sports, Inc. (Bell), facility (formerly known as the Vetter Fairings Company facility) in Rantoul, Champaign County, Illinois. This summary highlights the results of the PA/VSI and the potential releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

The facility is currently owned and operated by Bell. The facility manufactures bicycle and race car helmets and bicycle accessories. The only hazardous waste currently generated at the facility is waste paint with solvents (F003, F005). The nonhazardous wastes currently generated at the facility are paint sludge, waste oil, and scrap expandable polystyrene (EPS). Prior to 1990, the facility also generated waste paint containing acetone (F003). The facility occupies approximately 35 acres in a rural area and employs about 550 people. The facility is currently regulated as a large-quantity generator under RCRA.

Vetter Fairings Company built the facility in the late 1970s on agricultural land. From the late 1970s to 1981, Vetter Fairings Company manufactured motorcycle fairings and related accessories. Specific information describing waste generation and management of wastes associated with the manufacture of motorcycle fairings was not available in EPA, Illinois Environmental Protection Agency (IEPA), or facility files at the time of the PA/VSI. However, a 1986 IEPA inspection report noted that the facility generated wastes similar to those generated by manufacturing of bicycle and race car helmets and bicycle accessories.

In 1981, Vetter Fairings Company changed its name to Vetter Corporation. Vetter Corporation continued operations at the facility until 1983. In 1983, Vetter Products, Inc., a subsidiary of Bell, purchased Vetter Corporation and the facility. Vetter Products, Inc., continued manufacturing motorcycle fairings until 1986. In 1986, Bell assumed operation of the facility and converted operations to manufacturing of bicycle and race car helmets and bicycle accessories.

The facility submitted a Part A permit application (Part A) as a storage facility to the EPA in October 1980. Dynamac notes the facility also incorrectly identified on-site landfill disposal on the 1980 Part A. In 1988, IEPA conducted an inspection at the facility and approved RCRA closure activities concerning the storage unit at the facility.

The PA/VSI identified the following three SWMUs at the facility:

1. Indoor Accumulation Area
2. Outdoor Container Storage Area
3. Scrap EPS Storage Area

RELEASED  
DATE 9/7/00  
RIN #  
INITIALS

The PA/VSI did not identify any AOCs at the facility.

The potential for a release to ground water, surface water, air, or on-site soil from facility SWMUs is low. SWMU 1 accumulates both hazardous and nonhazardous waste indoors in closed 55-gallon drums on a concrete floor with no floor drains. SWMU 2 manages both hazardous and nonhazardous waste outdoors in closed 55-gallon drums on a compacted gravel surface surrounded by a six-foot chain-link fence. SWMU 3 manages nonhazardous waste indoors on a concrete floor with no drains. There is no history of documented releases at the facility.

The Bell facility is bordered on the north by farmland, on the east by two houses and farmland, on the south by Route 136, and on the west by a house and a church. The nearest school, Pleasant Acres School, is located approximately one and three-quarter miles west of the facility. Access to the facility is controlled by 24-hour manned security.

The nearest surface water body is an approximately one-acre excavated pond located at the facility that receives all surface water drainage from the facility. Facility representatives stated the water from this pond may be used in the event of a fire at the facility, but it is not used for any other purposes. Other surface water bodies in the area of the facility include the Upper Salt Fork and the East Salt Fork, located about three-quarters of a mile southwest and southeast of the facility, respectively. In addition, there are three flooded gravel pits, two of which are located within one mile south of the facility, and one of which is located within one mile southeast of the facility. John Reale of the Rantoul Water Department stated the Upper Salt Fork, the East Salt Fork, and the three flooded gravel pits are not used for recreational, industrial, or drinking water purposes.

The Village of Rantoul obtains its drinking water from four ground water wells located approximately three miles west of the facility. The direction of ground-water flow in the area of the facility has not been documented. However, it is likely the direction of flow is southwest toward the Salt Fork, the nearest probable ground water discharge area. Rantoul's drinking-water wells are therefore probably located cross-gradient from the facility.

There are no mapped wetlands or other sensitive environments within three miles of the facility.

Dynamac recommends no further action be taken for the facility at this time.

## 1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in EPA Region 5. PRC assigned Dynamac Corporation (Dynamac), its TES 9 subcontractor, to conduct the PA/VSI for the Bell Sports, Inc. (Bell), facility (formerly known as the Vetter Fairings Company facility) in Rantoul, Illinois.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; initially identifying potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of the PA/VSI of the Bell facility (EPA Identification No. ILD 075 611 525) in Rantoul, Champaign County, Illinois. The PA was completed on March 25, 1992. Dynamac gathered and reviewed information from files at the Illinois Environmental Protection Agency's (IEPA) Springfield, Illinois office and from EPA Region 5 RCRA files. Dynamac also gathered and reviewed information from the Federal Emergency Management Agency (FEMA), the National Oceanic and Atmospheric Administration (NOAA), the U.S. Department of the Interior (USDI), and from the U.S. Geological Survey (USGS). Deborah Hall and Russ Crittenden of Dynamac conducted the VSI on June 9, 1992. The VSI included interviews with facility representatives and a walk-through inspection of the facility. Dynamac identified three SWMUs and no AOCs at the facility.

Dynamac completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and seven inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C. In addition, a copy of the facility's August 1980 Part A Permit Application (Part A) is included in Attachment D.



## **2.0 FACILITY DESCRIPTION**

This section describes the facility's location; past and present operations; waste generating practices and waste management practices; a history of documented releases; regulatory history; environmental setting; and receptors.

### **2.1 FACILITY LOCATION**

The Bell facility is located on Route 136 two miles east of Rantoul, Champaign County, Illinois. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 40° 18' 44" N and longitude 88° 05' 53" W) (USGS, 1984). The facility occupies approximately 35 acres in a rural area.

The Bell facility is bordered on the north by farmland, on the east by two houses and farmland, on the south by Route 136, and on the west by a house and a church.

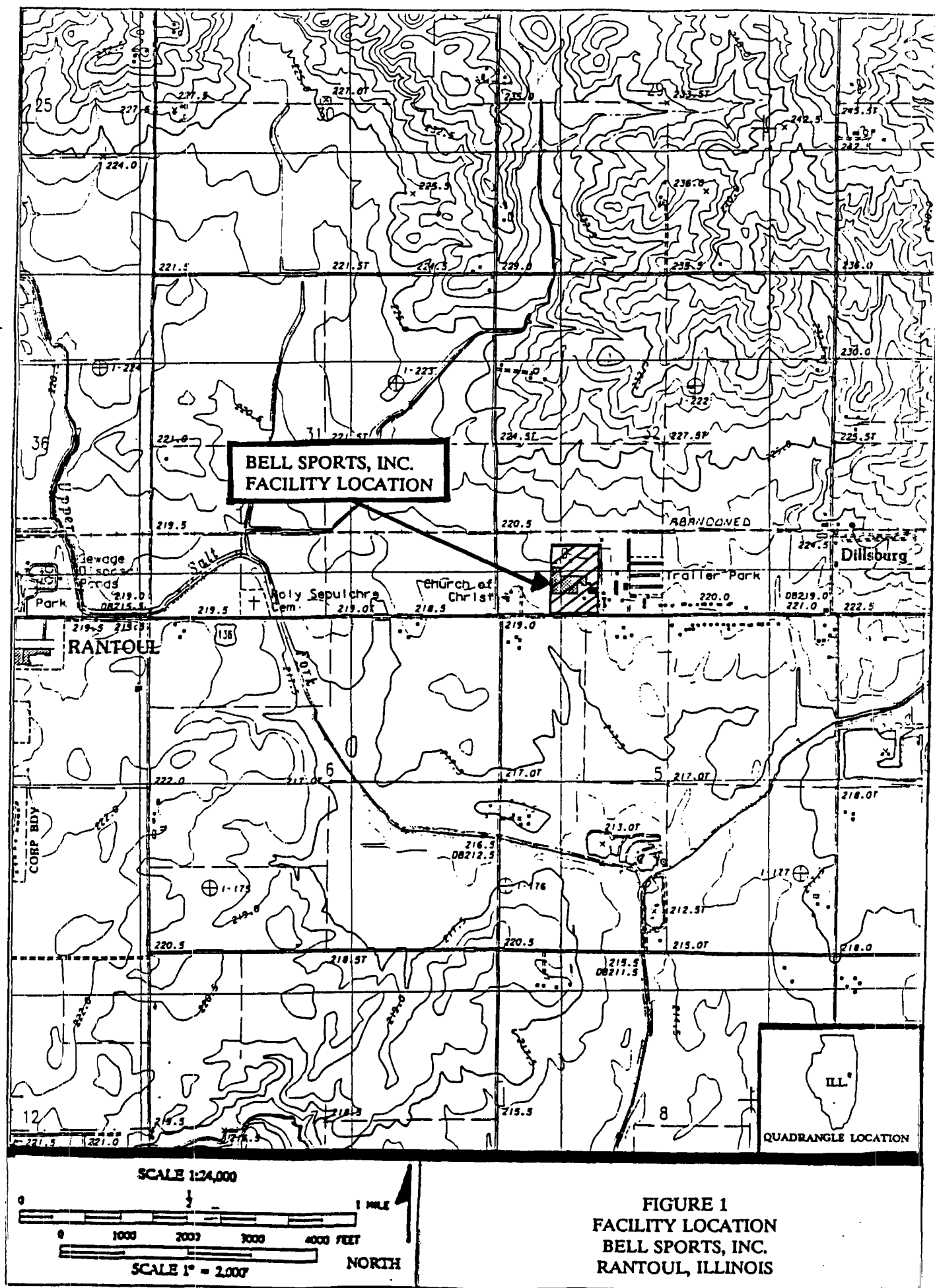
### **2.2 FACILITY OPERATIONS**

The facility is currently owned and operated by Bell. The facility manufactures bicycle and race car helmets and bicycle accessories. Operations include molding, painting, bending, and assembly. The facility uses expanded polystyrene (EPS), paints, solvents, decals, and metal and plastic stock to manufacture products. The facility stores unused solvents, paints, and other flammable raw materials indoors in 55-gallon drums in the flammable liquid storage building, centrally located within the facility. The facility packages the products as they are assembled and ships them off site to numerous retail facilities.

Solid wastes generated from facility operations and the SWMUs where they are managed are discussed in detail in Section 2.3.

Bell currently employs about 550 people, most of whom work an eight-hour shift five days per week. Access to the facility is controlled by 24-hour manned security. The facility consists of five buildings: one main building approximately 240,000 square feet in size; a foam molding building approximately 16,200 square feet in size; a boiler room building approximately 12,150 square feet in size; a flammable liquid storage building approximately 4,050 square feet in size; and a maintenance garage approximately 2,025 square feet in size. The facility also consists of an approximately 292,000-square-foot parking area and an approximately one-acre excavated pond.

Vetter Fairings Company built the facility in the late 1970s. From the late 1970s to 1981, Vetter Fairings Company manufactured motorcycle fairings and related accessories. Operations related to manufacturing motorcycle fairings included painting and vacuum forming of acrylonitrile-butadiene-styrene copolymer (ABS). In 1981, Vetter Fairings Company changed its name to Vetter Corporation (Vetter Corporation, 1981). Vetter Corporation continued operations until 1983. In 1983, Vetter Products, Inc., a subsidiary



SOURCE: Modified from USGS, 1984

of Bell, purchased Vetter Corporation and the facility. Vetter Products, Inc., continued manufacturing motorcycle fairings until 1986. In 1986, Bell assumed operation of the facility and converted operations to manufacturing of bicycle and race car helmets and bicycle accessories.

## **2.3 WASTE GENERATION AND MANAGEMENT**

Wastes are generated and managed at various locations at the facility. SWMUs and their current status are identified in Table 1. The locations of the SWMUs in relation to the facility layout are shown in Figure 2. Wastes generated at the facility are summarized in Table 2. Facility generation and management of both hazardous and nonhazardous wastes are discussed below.

The only hazardous waste currently generated at the facility is waste paint with solvents (F003, F005). The nonhazardous wastes currently generated at the facility are paint sludge, waste oil, and scrap EPS. Prior to 1990, the facility also generated waste paint containing acetone (F003). Specific information describing waste generation and management of wastes associated with the manufacture of motorcycle fairings was not available in EPA, IEPA, or facility files at the time of the PA/VSI. However, a 1986 IEPA inspection report noted that the facility generated wastes similar to those generated by manufacturing of bicycle and race car helmets and bicycle accessories (IEPA, 1986).

The facility annually generates approximately 3,800 gallons of waste paint with solvents (F003, F005) from cleaning painting equipment. The waste paint with solvents contains acetone, toluene, and/or, methyl ethyl ketone. Dynamac notes the waste codes for this waste were assigned by the facility; this waste should also be listed as D001, and potentially as D035. The facility accumulates the waste paint with solvents in a 55-gallon drum in the Indoor Accumulation Area (SWMU 1) before transferring the full drum to the Outdoor Container Storage Area (SWMU 2). Clayton Chemical Company transports this waste off site to its facility in Sauget, Illinois, for fuel blending.

The facility generates nonhazardous paint sludge from a wet paint booth located in the southern half of the main building at the facility (ESE, 1990). Each week the facility scoops approximately 55 gallons of paint sludge out of the water curtain collection tank into a 55-gallon drum. The facility then transfers the drum directly to the Outdoor Container Storage Area (SWMU 2). Decatur Waste Hauling, Inc., transports the waste off site to its facility in Decatur, Illinois, for landfill disposal.

The facility annually generates approximately 220 gallons of nonhazardous waste oil from machinery maintenance operations. The facility accumulates this waste in a 55-gallon drum in the Indoor Accumulation Area (SWMU 1) before transferring the drum to the Outdoor Container Storage Area (SWMU 2). Safety-Kleen Corporation in Champaign, Illinois, transports this waste off site to its facility for fuel blending.

**TABLE 1**  
**SOLID WASTE MANAGEMENT UNITS**

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit <sup>a</sup>	Status
1	Indoor Accumulation Area	No	Active for accumulation of hazardous and nonhazardous wastes
2	Outdoor Container Storage Area	Yes	RCRA closed in 1988; active for storage of nonhazardous waste and less than 90- day storage of hazardous waste
3	Scrap EPS Storage Area	No	Active for accumulation of nonhazardous waste

<sup>a</sup> A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

ILLINOIS CENTRAL RAILROAD

FACILITY BOUNDARY

SCRAP EPS  
STORAGE AREA  
(SWMU 3)

FOAM MOLDING  
BUILDING

POND

OUTDOOR CONTAINER  
STORAGE AREA  
(SWMU 2)

MAIN BUILDING

INDOOR  
ACCUMULATION AREA  
(SWMU 1)

PARKING

ILLINOIS ROUTE 136

0 100 200 300 400 feet

SCALE 1:2,160 1" = 180'

NORTH

FIGURE 2  
FACILITY LAYOUT  
BELL SPORTS, INC.  
RANTOUL, ILLINOIS

**TABLE 2  
SOLID WASTES**

<b>Waste/EPA Waste Code<sup>a</sup></b>	<b>Source</b>	<b>Solid Waste Management Unit</b>
Waste Paint with Solvents/F003, F005	Painting Operations	1, 2
Waste Paint containing Acetone (F003)	Former Painting Operations	2
Paint Sludge/NA <sup>a</sup>	Painting Operations	2
Waste Oil/ NA <sup>a</sup>	Machinery Maintenance	1, 2
Scrap EPS/NA <sup>a</sup>	Bicycle Helmet Manufacturing Operations	3

<sup>a</sup> Not applicable (NA) designates nonhazardous waste.

The facility routinely generates scrap EPS from rejected bicycle helmets. The facility presses the rejected helmets and stores the scrap EPS in cardboard boxes on wood pallets. Facility representatives could not estimate the scrap EPS generation rate. The wood pallets are located indoors on a concrete floor in the Scrap EPS Storage Area (SWMU 3). Approximately one time per month, Associated Transfer and Storage, Inc., of Champaign, Illinois, transports this waste off site to Polysource, Inc., located in Sydney, Ohio, for recycling.

Prior to 1990, the facility annually generated approximately 220 gallons of waste paint containing acetone (F003) from purging the paint lines of the paint booth. The facility managed this waste in 55-gallon drums in the Outdoor Container Storage Area (SWMU 2). Ashland Chemical Company from Milwaukee, Wisconsin transported this waste off site to Industrial Fuel and Resources in South Bend, Indiana for fuel-blending.

## **2.4 HISTORY OF DOCUMENTED RELEASES**

There was no history of documented releases at the facility available in EPA or IEPA files at the time of the PA/VSI.

## **2.5 REGULATORY HISTORY**

Vetter Fairings Company submitted a Notification of Hazardous Waste Activity (Notification) identifying the facility as a generator, transporter, and storage facility to the EPA on August 6, 1980 (Vetter Fairings Company, 1980a). Vetter Fairings Company submitted a Part A identifying the facility as a generator, storage, and disposal facility to the EPA on October 20, 1980. The Part A indicated the facility generated 18,848 pounds of F003, U002 waste; 8,355 pounds of F005, U159 waste; 800 pounds of U220 waste; 3,612 pounds of U112 waste; 73,593 pounds of F017 waste; 5,139 pounds of F002 waste; 387,200 pounds of F018, K002, K003, K004, K006, K007, K008 waste; 210 pounds of K078 waste; 210 pounds of K081 waste; and 210 pounds of K082 waste (Vetter Fairings Company, 1980b) (See Attachment D for a copy of the Part A). IEPA determined the facility inaccurately listed all waste codes with the exception of F003 and F005 (IEPA, 1986). The Part A identified a container storage area (S01) with the capacity to store 23,333 gallons of waste. The S01 code referred to SWMU 1, the Outdoor Container Storage Area (Vetter Fairings Company, 1980b). Dynamac notes the facility also incorrectly listed D80, on-site landfill disposal, as a process code for the listed wastes. Facility representatives did not have further information regarding why this information was erroneously listed on the Part A.

Vetter Corporation submitted a request for withdrawal of the Part A to the EPA on June 18, 1981 (Vetter Corporation, 1981). In 1983, Vetter Products, Inc., submitted a subsequent Notification to the EPA reporting its purchase of Vetter and the facility. The subsequent Notification indicated the facility generated F003 and F005 wastes (Vetter Products, Inc., 1983). There was no information in EPA or IEPA files at the time of the PA/VSI as to whether EPA ever approved the facility's 1981 request to withdraw the Part

A. However, in March 1987 Bell submitted a closure plan for the Outdoor Container Storage Area (SWMU 2) to the IEPA (Bell, 1987). In May 1988, IEPA inspected the facility and approved the closure of the unit (IEPA, 1988b). IEPA has regulated the facility as a large-quantity generator since that time.

In the past, the facility has had RCRA compliance problems. During RCRA compliance inspections from 1981 to 1986, IEPA cited the facility for numerous deficiencies including failure to have a written waste analysis plan, contingency plan, or closure plan; failure to label the hazardous waste storage area; failure to maintain proper facility records; and failure to prepare and submit an annual report (IEPA, 1981; 1984a; 1984b; 1986). Following an October 21, 1986, inspection, IEPA requested the facility to attend a pre-enforcement conference to discuss the violations cited during the inspection (IEPA, 1987). During the June 1988 inspection of closure activities at the facility, IEPA acknowledged the facility had resolved all violations cited during the 1986 inspection (IEPA, 1988a).

Bell operates the facility under state air permit No. 87040042, which covers two natural gas boilers and the painting operations at the facility (IEPA, 1991). There was no EPA or IEPA file information available regarding air permit compliance problems at the facility or whether IEPA conducted air permit compliance inspections at the facility.

In August 1986, EPA received a complaint from an anonymous caller who alleged the facility was disposing of cleaning solvents at the facility (EPA, 1986). During the October 1986 inspection of the facility, IEPA reported there was no evidence of recent excavation, visibly stained soil, or any other indication the facility had been dumping solvent on site (IEPA, 1986). There was no information in EPA or IEPA files at the time of the PA/VSI indicating whether there were any subsequent complaints regarding the Bell facility. There has not been any Superfund activity at the facility.

The Bell facility is not required to have a National Pollutant Discharge Elimination System (NPDES) permit.

From approximately 1978 until 1990, the facility maintained a 10,000-gallon underground storage tank (UST) used to store heating fuel. The UST was located along the south wall of the main building at the facility. In June 1990, the facility removed and disposed of the UST (Bell, 1990). According to facility representatives, the facility conducted this activity under oversight by the Office of the Illinois State Fire Marshal. In addition, facility representatives stated the UST was intact upon removal and had not released any heating oil to the surrounding soil. The facility did not file an Illinois Emergency Services and Disaster Agency (IESDA) report or conduct a leak test of the UST or verification soil sampling. The facility did submit an amended Notification for Underground Storage Tanks to the IEPA on June 15, 1990, indicating the facility had removed and disposed of the UST (Bell, 1990). This area is not an AOC because the Illinois State Fire Marshall present during the removal activities concurred with the facility's assessment of the condition of the UST and the surrounding soil during the removal activities (ISFM, 1992).



## **2.6 ENVIRONMENTAL SETTING**

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the Bell facility.

### **2.6.1 Climate**

The Bell facility is located approximately 40 miles southeast of Normal, Illinois, where the nearest National Weather Service office is located. The climate in this area is continental with cold winters and warm summers. The average annual daily temperature is 52.5° Fahrenheit (F). The highest average daily temperature is 86.6° F in July, and the lowest average daily temperature is 17.0° F in January. The total annual precipitation is 36.41 inches (NOAA, 1975). Mean annual lake evaporation for the area is approximately 32 inches and net annual precipitation is approximately 4.4 inches. The one-year 24-hour maximum rainfall is approximately 2.6 inches (NOAA, 1979a). The prevailing wind is from the south, and the wind speed is highest in April at 12 miles per hour (NOAA, 1979b).

### **2.6.2 Flood Plain and Surface Water**

The Bell facility is located in an area of minimal flooding outside the 100-year flood plain of any surface water body (FEMA, 1984). The nearest surface water body is the one-acre excavated, unlined pond centrally located along the east side of the facility. Facility representatives stated the water in this pond may be used in the event of a fire at the facility. Other surface water bodies in the area are the Upper Salt Fork and the East Salt Fork, located approximately three-quarters of a mile southwest and southeast of the facility, respectively. In addition, there are three flooded gravel pits ranging in size from about 10 acres to about 20 acres located within one mile of the facility. John Reale, Water Superintendent, Rantoul Water Department (RWD), stated neither the Upper Salt Fork, nor the East Salt Fork are used for recreational, industrial, or drinking water purposes. Mr. Reale does not believe the flooded gravel pits are used for these activities either (RWD, 1992). Surface water drainage at the facility is toward the one-acre pond located at the facility.

### **2.6.3 Geology and Soils**

The soils of the facility are mapped as Brenton silt loam, Drummer silty clay loam, Proctor silt loam, and Ashkum silty clay loam. Brenton silt loam is a dark gray, somewhat poorly drained, moderately permeable soil developed on outwash plains. Drummer silty clay loam is a deep black, poorly drained, moderately-slowly permeable soil developed on outwash plains. Proctor silt loam is a deep brown, moderately well drained, moderately permeable soil developed on outwash plains. Ashkum silty clay loam is a deep black, poorly drained, moderately-slowly permeable soil developed on drainageways (SCS, 1982).

The surficial deposits in the area around the Bell facility are mapped as the Batavia Member of the Henry Formation. These are outwash sand and gravel deposits laid down south of a moraine that trends northwest to southeast and located approximately one mile north of the facility. The moraine is composed of the Snider Till Member of the Wedron Formation. The moraine and the associated outwash overlie a till plain comprised of the Batestown Till Member of the Wedron Formation. The Batestown Till is a gray silty till. The Wedron and Henry Formations were deposited during the Wisconsinian glaciation and overlie tills and outwash deposits from the Illinoian and pre-Illinoian glaciation (Lineback, 1979). The total thickness of the surficial deposits is approximately 300 feet in the vicinity of the facility. The thickness of the surficial deposits increases to more than 400 feet in the area of the buried Mahomet bedrock valley, located approximately five miles northwest of the facility (Selkregg and Kempton, 1958).

The uppermost bedrock formation underlying the facility is the Caseyville Formation of early Pennsylvanian age. This formation is principally composed of shale, with some interbedded limestone and sandstone. The Caseyville Formation is less than 100 feet thick and overlies Mississippian-age Kinderhookian Shale, which in turn overlies thin Devonian-age limestones. Silurian-age Niagran Dolomite occurs at a depth of approximately 500 feet below ground surface (BGS) under the Devonian limestone, and is present directly below the surficial deposits filling the Mahomet valley (Selkregg and Kempton, 1958).

#### **2.6.4 Ground Water**

Although there may be a few wells drilled into the Pennsylvanian bedrock in Champaign County, the most important aquifer is the sand and gravel deposits. This aquifer is unconfined and has moderate to high yields in the area of the Bell facility (Selkregg and Kempton, 1958). There are no monitoring wells at the facility and the depth to ground water has not been documented. There is a one-acre excavated pond at the facility, and the water level of the pond is likely to reflect the elevation of the ground water surface. The water level in the pond is approximately six feet BGS. The direction of the ground-water flow is also not documented, but is likely to be southwest towards the Salt Fork.

The Village of Rantoul obtains its drinking water from four ground water wells located approximately three miles west of the facility. These wells draw from the sand and gravel aquifer at a depth of approximately 290 feet BGS (RWD, 1992).

#### **2.7 RECEPTORS**

The Bell facility occupies approximately 35 acres in a rural area in Rantoul, Illinois, which had a 1990 population of 17,212 persons (RVH, 1992). The facility employs about 550 persons.

The Bell facility is bordered on the north by farmland, on the east by two houses and farmland, on the south by Route 136, and on the west by a house and a church. The nearest school, Pleasant Acres School, is located approximately one and three-quarter miles west of the facility (USGS, 1984). Access to the facility is controlled by 24-hour manned security.

The nearest surface water body is an approximately one-acre excavated pond located at the facility that receives all surface water drainage from the facility. Facility representatives stated the water from this pond may be used in the event of a fire at the facility, but it is not used for any other purposes. Other surface water bodies in the area of the facility include the Upper Salt Fork, the East Salt Fork, and three flooded gravel pits. Mr. Reale, Rantoul Water Department, stated these surface water bodies are not used for recreational, industrial, or drinking water purposes (RWD, 1992).

The Village of Rantoul obtains its drinking water from four ground water wells located approximately three miles west of the facility (RWD, 1992). The direction of ground-water flow in the area of the facility has not been documented. However, it is likely the direction of flow is southwest toward the Salt Fork. If this is so, Rantoul's drinking-water wells are located cross-gradient from the facility.

There are no mapped wetlands or other sensitive environments within three miles of the facility (USGS, 1984; USDI, undated).

### 3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the three SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and Dynamac's observations. Figure 2 shows the SWMU locations.

<b>SWMU 1</b>	<b>Indoor Accumulation Area</b>
Unit Description:	The Indoor Accumulation Area consists of a 64-square-foot area located indoors in a concrete-floored hallway adjacent to a paint booth room at the south end of the facility. This unit is used to accumulate waste paint with solvents (F003, F005) and nonhazardous waste oil in 55-gallon drums. There are no floor drains in the area of this unit.
Date of Startup:	The unit began operations in the late 1970s.
Date of Closure:	This unit is currently active.
Wastes Managed:	This unit is used to accumulate waste paint with solvents (F003, F005) and nonhazardous waste oil in 55-gallon drums. When a drum of either waste becomes full, the facility transfers it to the Outdoor Container Storage Area (SWMU 2). Wastes from this unit are ultimately shipped off site for fuel-blending.
Release Controls:	This unit managed waste indoors in closed 55-gallon drums located on a concrete floor with no floor drains.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	Dynamac observed one 55-gallon drum approximately one-third full of paint waste with solvents (F003, F005) (See Photo No. 1). At the time of the VSI, the facility was not accumulating nonhazardous waste oil. The concrete floor in the area of this unit appeared to be in sound condition; there were no stains or visible evidence of previous releases in this area.

## **SWMU 2**

### **Outdoor Container Storage Area**

**Unit Description:** The Outdoor Container Storage Area consists of an 1,800-square-foot area centrally located within the facility. This unit is surrounded by a six-foot chain-link fence labeled "Caution-Hazardous Waste Storage Area" and has a compacted gravel surface. The unit is used for less than 90-day storage of waste paint with solvents (F003, F005) from SWMU 1, as well as storage of nonhazardous paint sludge and waste oil. Runoff from this unit is toward the pond located at the facility.

**Date of Startup:** The date of startup for this unit was prior to 1980.

**Date of Closure:** IEPA approved RCRA closure of this unit in 1988. This unit is currently active for storage of nonhazardous waste and less than 90-day storage of hazardous waste.

**Wastes Managed:** This unit manages waste paint with solvent (F003, F005), which contains acetone, toluene, and MEK, for less than 90 days. This unit also manages nonhazardous paint sludge and waste oil. Prior to 1990, the facility also used this unit to manage waste paint containing acetone (F003). The facility shipped the waste paint containing acetone off site for fuel blending. The facility currently ships the waste paint with solvent and the nonhazardous waste oil off site for fuel blending, and the nonhazardous paint sludge off site for landfilling.

**Release Controls:** This unit manages waste outdoors in closed 55-gallon drums on wood pallets on a compacted gravel surface. According to facility representatives, the facility plans to install a concrete pad in this area around the end of June 1992.

**History of Documented Releases:** No releases from this unit have been documented.

**Observations:** Dynamac observed twelve 55-gallon drums containing waste paint with solvent (F003, F005), each of which were stored on wood pallets and were labeled and dated (See Photo Nos. 3 and 4). Two of these drums were dated March 1, 1992, which indicates the facility stored the drums for greater than 90 days. However, Nick Riddle of Bell stated the facility had mislabeled the two drums, and the date should have read April 1, 1992.

Mr. Riddle stated Bell had not stored hazardous waste at the facility for greater than 90 days since the unit underwent IEPA-approved RCRA closure in 1988. Dynamac also observed numerous empty drums and forty-five 55-gallon drums of nonhazardous paint sludge on wood pallets within the unit (See Photo Nos. 2 and 5). There were no visible stains or evidence of a previous release in the area of this unit.

### **SWMU 3**

#### **Scrap EPS Storage Area**

Unit Description:	The Scrap EPS Storage Area is located indoors on a concrete floor with no floor drains in the foam molding building at the facility. The facility uses the unit to store scrap EPS in cardboard boxes on wood pallets in an area measuring approximately 150 square feet.
Date of Startup:	The date of startup for this unit was approximately 1988.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages nonhazardous scrap EPS from bicycle helmet manufacturing processes. The facility ships this waste off site for recycling.
Release controls:	This unit manages nonhazardous waste indoors on wood pallets on a concrete floor with no floor drains.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	Dynamac observed one sealed six-cubic-foot cardboard box containing scrap EPS located on a wood pallet and one open six-cubic-foot cardboard box about half-full with scrap EPS in this unit (See Photo Nos. 6 and 7). There were no visible stains or evidence of a previous release in the area of this unit.

#### **4.0 AREAS OF CONCERN**

Dynamac identified no AOCs during the PA/VSI.

## 5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified three SWMUs and no AOCs at the Bell facility. Background information on the facility's location; operations; waste generation and management; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. Following are Dynamac's conclusions and recommendations for each SWMU. Table 3, located at the end of this section, summarizes the SWMUs at the facility and the recommended further actions.

### **SWMU 1                      Indoor Accumulation Area**

**Conclusions:**            The Indoor Accumulation Area consists of a 64-square-foot area located indoors on a concrete-floored hallway with no apparent cracks. This unit is used to accumulate waste paint with solvents (F003, F005) and nonhazardous waste oil in 55-gallon drums prior to transferring a full drum to the Outdoor Container Storage Area (SWMU 2). There are no floor drains in the area of this unit.

Due to the release controls described above, the potential for a release to ground water, surface water, air, and on-site soils from this unit is low.

**Recommendations:** Dynamac recommends no further action for this unit.

### **SWMU 2                      Outdoor Container Storage Area**

**Conclusions:**            The Outdoor Container Storage Area consists of an 1,800-square-foot area with a compacted gravel floor surrounded by a six-foot chain-link fence. The unit is currently used for less than 90-day storage of waste paint with solvents (F003, F005) from SWMU 1, as well as for storage of nonhazardous paint sludge and waste oil. Prior to 1990, the facility also used this unit to manage waste paint containing acetone (F003). IEPA approved RCRA closure of this unit in 1988. According to facility representatives, the facility plans to install a concrete pad in this area around the end of June 1992.

Due to the release controls described above the potential for a release to ground water, surface water, air, and on-site soils is low.

**Recommendations:** Dynamac recommends no further action for this unit.



**SWMU 3**

**Scrap EPS Storage Area**

**Conclusions:**

The Scrap EPS Storage Area is located indoors on a concrete floor with no floor drains. The facility uses the unit to store nonhazardous scrap EPS from bicycle helmets manufacturing operations in cardboard boxes on wood pallets.

Due to the release controls described above, the potential for a release to ground water, surface water, air, and on-site soils from this unit is low.

**Recommendations:** Dynamac recommends no further action for this unit.

TABLE 3  
SWMU SUMMARY

<u>Solid Waste Management Unit</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Indoor Accumulation Area	The late 1970s to the present	None	None
2. Outdoor Container Storage Area	Prior to 1980 to the present	None	None
3. Scrap EPS Storage Area	Approximately 1988 to the present	None	None

## REFERENCES

- Bell Sports, Inc. (Bell), 1987. Letter to Linda Kissinger, IEPA, from Nick Riddle, Bell, regarding resolution to facility compliance violations, March 12.
- Bell, 1990. Notification for Underground Storage Tanks submitted to Illinois State Fire Marshal (ISFM), June 15.
- Environmental Science & Engineering, Inc. (ESE), 1990. Analytical results for waste paint sludge sample analyzed on September 24, 1990, October 23.
- Federal Emergency Management Agency (FEMA), 1984. Flood Insurance Rate Map, County of Champaign, Illinois, March 1.
- Illinois Environmental Protection Agency (IEPA), 1981. Inspection Report for the Vetter Fairings Company facility prepared by Dorothy Jones, IEPA, September 28.
- IEPA, 1984a. Memorandum from William Zierath, IEPA, to Division Files, regarding an Interim Status Standards Inspection at the Vetter Products, Inc., facility, October 3.
- IEPA, 1984b. Compliance Inquiry Letter to Vetter Products, Inc., from Glen Savage, IEPA, concerning violations cited during an October 3, 1984, inspection at the facility, November 2.
- IEPA, 1986. Inspection Report for the Vetter Products, Inc., facility prepared by William Zierath, IEPA, October 21.
- IEPA, 1987. Pre-Enforcement Letter to Vetter Products, Inc., from IEPA, requesting facility representatives to attend a pre-enforcement conference in response to violations cited during an October 21, 1986, IEPA inspection at the facility, January 23.
- IEPA, 1988a. Letter to Vetter Products, Inc., from Angela Aye Tin, IEPA, regarding resolution of violations cited during an October 21, 1986, IEPA inspection at the facility, July 22.
- IEPA, 1988b. Letter to Nick Riddle, Bell Sports, Inc., from Lawrence Eastep, IEPA, regarding IEPA approval of closure activities conducted on June 29, 1988 at the facility, August 19.
- IEPA, 1991. Operating Air Permit issued to Bell Sports, Inc. facility from IEPA, November 21.
- Lineback, 1979. Quaternary Deposits in Illinois, Map 1:500,000.

## REFERENCES (continued)

- National Oceanic and Atmospheric Administration (NOAA), 1975. Climatography of the U.S., No. 20, Ashville North Carolina.
- NOAA, 1979a. Climatic Atlas of the U.S., Ashville, North Carolina.
- NOAA, 1979b. Climatography of the U.S., No. 90, Airport Climatological Survey, Peoria, Illinois, March.
- Illinois State Fire Marshal (ISFM), 1989. Permit for Removal of Underground Storage Tanks for Petroleum and Hazardous Materials issued to Bell Sports, Inc., December 15.
- ISFM, 1992. Telephone conversation between Jan Tucker, Illinois State Fire Marshal, and Deborah Hall, Dynamac, regarding underground storage tank removal requirements, August 26.
- Rantoul Village Hall (RVH), 1992. Telephone Conversation between Kent Tucker, RVH, and Deborah Hall, Dynamac Corporation (Dynamac), regarding 1990 population of the Village of Rantoul.
- Rantoul Water Department (RWD), 1992. Telephone conversation between John Reale, Superintendent, RWD, and Deborah Hall, Dynamac, regarding surface water use in the Rantoul area.
- Selkregg and Kempton, 1958. Ground Water Geology in East-Central Illinois A Preliminary Geological Report. Illinois State Geological Survey Circular 248, 1958.
- Soil Conservation Service (SCS), 1982. Soil survey of Champaign County, Illinois, March 1982.
- U.S. Department of the Interior (USDI), undated. National Wetlands Inventory Map, 1:24,000 scale, Gifford, Illinois Quadrangle.
- U.S. Environmental Protection Agency (EPA), 1986. Letter to Field Operations Section, IEPA, concerning an anonymous complaint regarding solvent disposal at the Vetter Corporation facility, August 28.
- U.S. Geological Survey (USGS), 1984. 7.5 Minute Series Topographic Map, Gifford, Illinois Quadrangle, 1:24,000, Provisional Edition, 1984.
- Vetter Fairings Company, 1980a. Notification of Hazardous Waste Activity (Notification) submitted to U.S. EPA, August 6.
- Vetter Fairings Company, 1980b. Part A Permit Application (Part A) submitted to U.S. EPA, October 20.

## REFERENCES (continued)

Vetter Corporation, 1981. Letter to U.S. EPA from James Stowe, Vetter Corporation, requesting withdrawal of the Part A, June 18.

Vetter Products, Inc., 1983. Subsequent Notification submitted to the U.S. EPA indicating purchase of the facility, April 12.

**ATTACHMENT A**

**EPA PRELIMINARY ASSESSMENT FORM 2070-12**

## II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)		02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER				
Bell Sports, Inc.		Route 136, east two miles				
03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST	
Rantoul	IL	61866	Champaign			
09 COORDINATES: LATITUDE		LONGITUDE				
40° 18' 44" N		088° 05' 53" W				
10 DIRECTIONS TO SITE (Starting from nearest public road)						
Route 136 east from Rantoul, two miles; facility is on the north side of the road.						

### III. RESPONSIBLE PARTIES

<b>01 OWNER</b> ( <i>If known</i> ) Bell Sports, Inc.						<b>02 STREET</b> ( <i>Business, mailing, residential</i> ) P.O. Box 927															
<b>03 CITY</b> Rantoul						<b>04 STATE</b> IL		<b>05 ZIP CODE</b> 61866		<b>06 TELEPHONE NUMBER</b> (217) 893-9300											
<b>07 OPERATOR</b> ( <i>If known and different from owner</i> )						<b>08 STREET</b> ( <i>Business, mailing, residential</i> )															
<b>09 CITY</b>						<b>10 STATE</b>		<b>11 ZIP CODE</b>		<b>12 TELEPHONE NUMBER</b>											
<b>13 TYPE OF OWNERSHIP</b> ( <i>Check one</i> ) <input type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ ( <i>Agency Name</i> )  <input type="checkbox"/> F. OTHER _____ ( <i>Specify</i> )														<input type="checkbox"/> C. STATE  <input type="checkbox"/> G. UNKNOWN				<input type="checkbox"/> D. COUNTY  <input type="checkbox"/> E. MUNICIPAL			

## 14. OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☒ A. RCRA 3010 DATE RECEIVED: 08 06 80 ☐ B. UNCONTROLLED WASTE SITE (RCRA 103 d) DATE RECEIVED: 1 1 ☐ C. NONE  
MONTH DAY YEAR MONTH DAY YEAR

#### IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION		BY (Check all that apply)	
<input checked="" type="checkbox"/> YES	DATE <u>06/09/92</u>	<input type="checkbox"/> A. EPA	<input type="checkbox"/> B. EPA CONTRACTOR
<input type="checkbox"/> NO		<input type="checkbox"/> C. STATE	<input type="checkbox"/> D. OTHER CONTRACTOR
		<input type="checkbox"/> E. LOCAL HEALTH OFFICIAL	<input type="checkbox"/> F. OTHER _____
		(Specify)	
CONTRACTOR NAME(S):		<u>Dynamac Corporation</u>	
02 SITE STATUS (Check one)		03 YEARS OF OPERATION	
<input checked="" type="checkbox"/> A. ACTIVE	<input type="checkbox"/> B. INACTIVE	late 1970s to present	
<input type="checkbox"/> C. UNKNOWN		BEGINNING YEAR ENDING YEAR	
		<input type="checkbox"/> UNKNOWN	

## (14) DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Acetone, toluene, and methyl ethyl ketone.

## (15) DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

Substances present are flammable and volatile.

## V. PRIORITY ASSESSMENT

(1) PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)

<input type="checkbox"/> A. HIGH (inspection required promptly)	<input type="checkbox"/> B. MEDIUM (inspection required)	<input checked="" type="checkbox"/> C. LOW (inspect on time-available basis)	<input type="checkbox"/> D. NONE (No further action needed; complete current disposition form)
--	---	---	---

## VI. INFORMATION AVAILABLE FROM

01 CONTACT Kevin Pierard		02 OF (Agency/Organization) U.S. EPA		03 TELEPHONE NUMBER (312) 836-4445
04 PERSON RESPONSIBLE FOR ASSESSMENT Deborah Hall Russ Crittenden		05 AGENCY ----	06 ORGANIZATION Dynamac Corp.	07 TELEPHONE NUMBER (312) 466-0222
				08 DATE 06/09/92 MONTH DAY YEAR

**ATTACHMENT B**

**VISUAL SITE INSPECTION**  
**SUMMARY AND**  
**PHOTOGRAPHS**



## **VISUAL SITE INSPECTION SUMMARY**

**Bell Sports, Inc., Facility  
Route 136 Two Miles East  
Rantoul, Illinois  
ILD 075 611 525**

**Date:** June 9, 1992

**Primary Facility Representative:** Nick Riddle, Facility Manager, Bell Sports, Inc.  
**Representative Telephone Number:** (217) 893-9300

**Additional Facility Representatives:** William Hassell, Vice President-Operations, Bell Sports, Inc.  
Timothy Maupin, Director of Human Resources, Bell Sports, Inc.  
Kenneth Konter, Manager, Audits and Industrial Compliance, Environmental Science & Engineering, Inc.  
Ted Nehrkorn, Environmental Engineer, Environmental Science & Engineering, Inc.

**Inspection Team:** Deborah Hall, Dynamac Corporation  
Russ Crittenden, Dynamac Corporation

**Photographer:** Deborah Hall, Dynamac Corporation

**Weather Conditions:** Sunny; about 70° F

**Summary of Activities:** The visual site inspection (VSI) began at 9:45 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents and/or agreed to mail copies of requested documents that were not available at the time of the VSI.

The VSI tour began at 10:50 a.m. The inspection team walked to the south end of the main building at the facility where Dynamac observed the Indoor Accumulation Area (SWMU 1), located immediately

Visual Site Inspection Summary  
Bell Sports, Inc., Facility  
June 9, 1992

adjacent to a paint booth room. This unit contained 1 closed 55-gallon drum containing about 20 gallons of paint waste with solvents (F003, F005). The inspection team continued walking through the main building where Dynamac observed numerous manufacturing areas. The inspection team proceeded to walk outside to an area centrally located within the facility where Dynamac observed the Outdoor Container Storage Area (SWMU 2). This unit contained twelve 55-gallon drums containing waste paint with solvents, forty-five 55-gallon drums containing nonhazardous paint sludge, and numerous empty 55-gallon raw material drums. All of the drums in this unit were closed and on wood pallets. The inspection team then walked to the far northeast corner of the facility to the foam molding building. Here, Dynamac observed the Scrap EPS Storage Area (SWMU 3). This unit contained one sealed and one unsealed six-cubic-foot cardboard box, each containing scrap EPS. Finally, the inspection team walked to an area located outdoors and immediately south of the Outdoor Container Storage Area (SWMU 2). This area formerly contained an underground storage tank used to store heating fuel.

The tour concluded at approximately 11:30 a.m., after which the inspection team held an exit interview with the facility representatives. The inspection team completed the VSI and left the facility at 12:00 p.m.

**PHOTOGRAPHS**

**BELL SPORTS, INC., FACILITY  
RANTOUL, ILLINOIS**

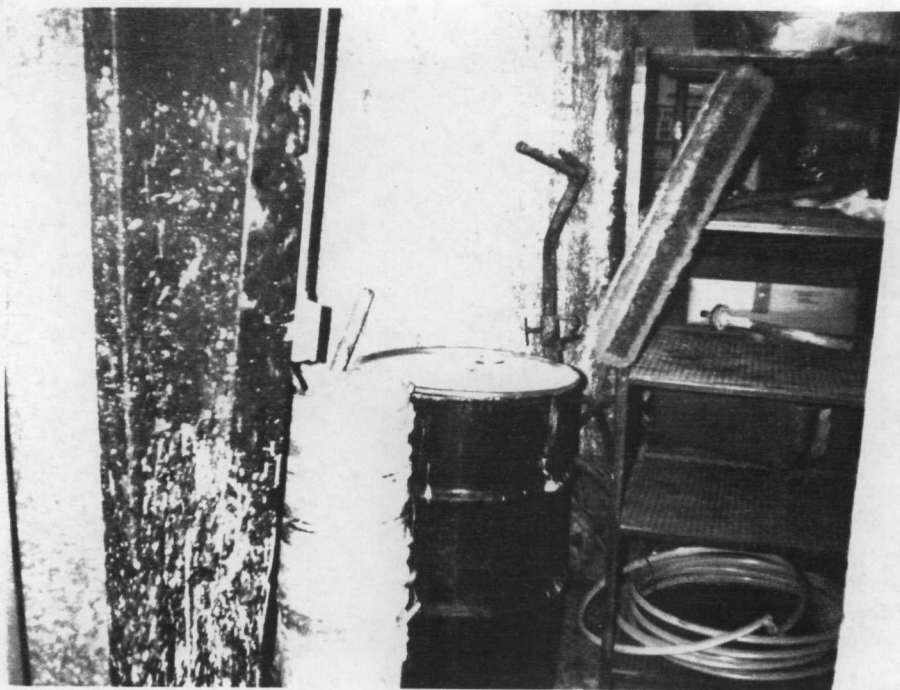


Photo No.:  
Orientation:  
Description:

1

South

Indoor Accumulation Area centrally located in the southern half of the main building at the facility. The blue drum contains about 20 gallons of waste paint with solvents (F003, F005).

Location: SWMU 1

Date: June 9, 1992

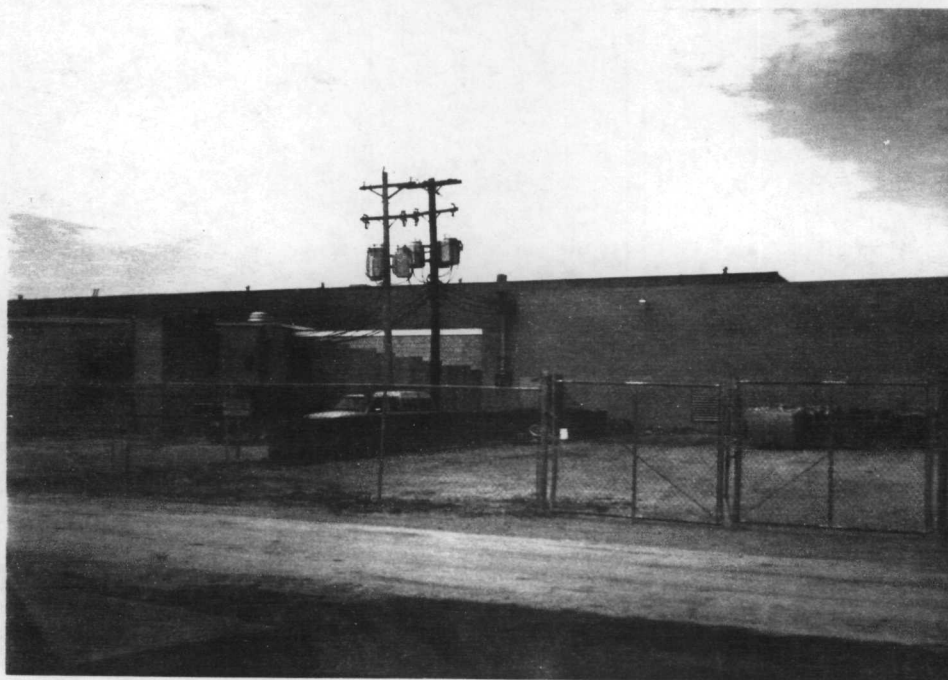


Photo No.:  
Orientation:  
Description:

2

West

Southern-half of the Outdoor Container Storage Area centrally located within the facility. The 55-gallon drums along the south side of this unit are empty raw material drums awaiting return to the manufacturer.

Location: SWMU 2

Date: June 9, 1992



Photo No.: 3  
 Orientation: West  
 Description: Northern-half of the Outdoor Container Storage Area.

Location: SWMU 2  
 Date: June 9, 1992



Photo No.: 4  
 Orientation: West  
 Description: Close-up of twelve 55-gallon drums containing waste paint with solvents (F003, F005) located in the north half of the Outdoor Container Storage Area.

Location: SWMU 2  
 Date: June 9, 1992



Photo No.: 5  
 Orientation: West  
 Description: Close-up of forty-five 55-gallon drums containing nonhazardous paint sludge located in the north half of the Outdoor Container Storage Area.

Location: SWMU 2

Date: June 9, 1992

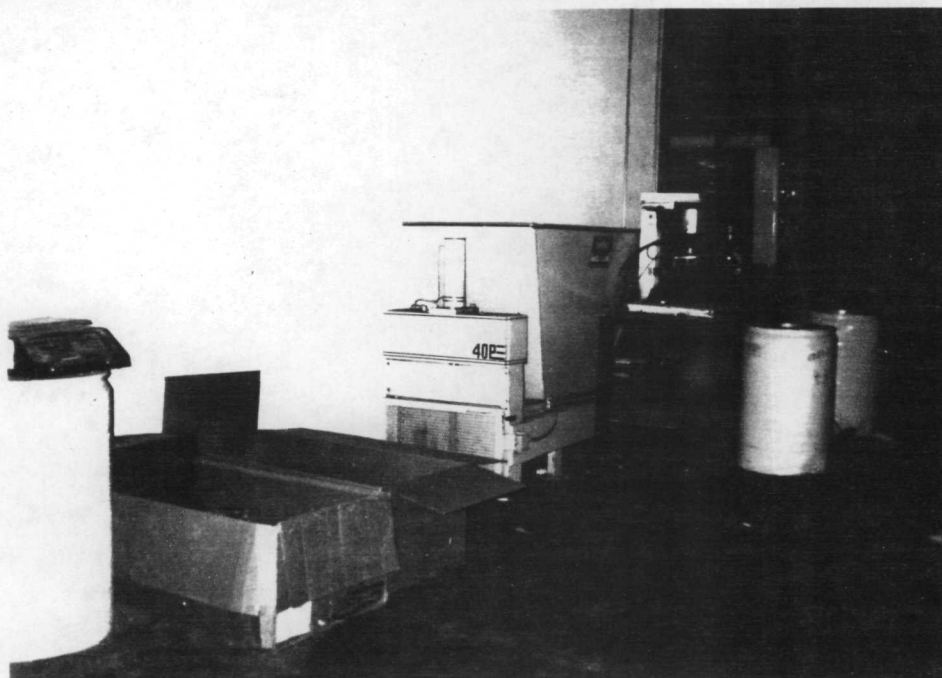


Photo No.: 6  
 Orientation: East  
 Description: An unsealed cardboard box half-full of nonhazardous scrap EPS located in the Scrap EPS Storage Area.

Location: SWMU 3

Date: June 9, 1992



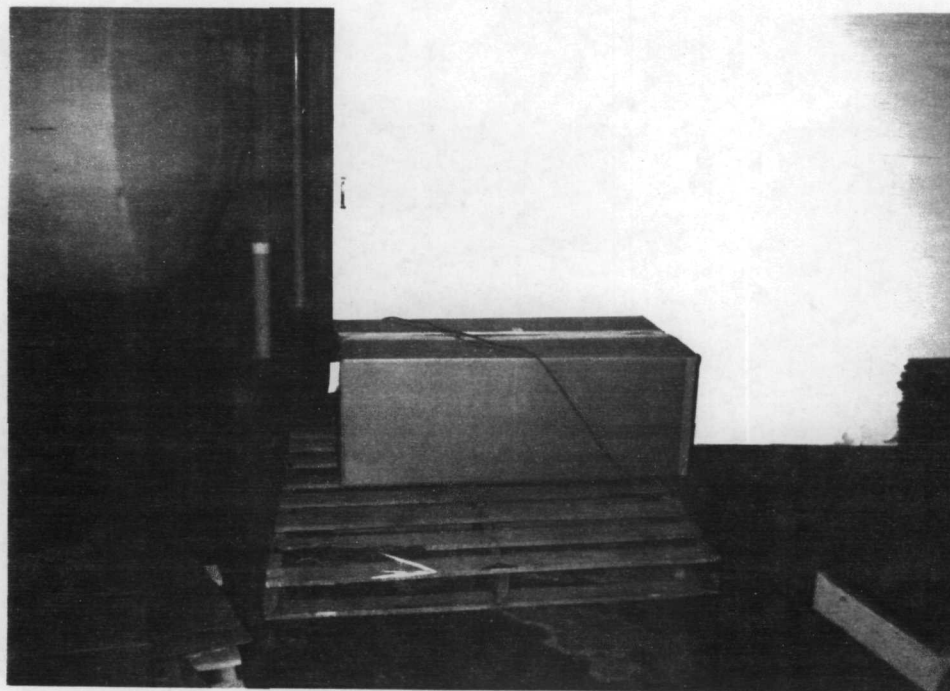


Photo No.:	7	Location:	SWMU 3
Orientation:	North	Date:	June 9, 1992
Description:	A sealed cardboard box full of nonhazardous scrap EPS located in the Scrap EPS Storage Area.		

**END OF PHOTOGRAPHS**

**ATTACHMENT C**

**VISUAL SITE INSPECTION**

**FIELD NOTES**



June 9, 1992

14

## Vetter Facility / Bell Sports

Arrival 9:40 A.M. Inspectors: Russ Crittenden  
: Deborah Hall

Facility Representatives: Nick Riddle - Facilities Manager  
William Hassell - VP - Operations  
Tim Maupin - Dir. Human Resources  
Env. Scienc. Eng. - Ted Nehrkorn  
" - Ken Koster

9:45 Met with facility reps in conference room.

Deb and Russ explained purpose of inspection and got information on general facility operations, history and size.

Company is large - Q generator. Underwent closure due to inadvertent storage ≥ 90 days. Records prior to 1986 lost in fire of administrative building fire.

Permits - air permits - 1 facility permit. requested copy  
- no water discharge

USTs - one for heating oil.

9:55 Moved on to Facility operations and waste streams.

Painting - acetone for thinning cleaning.

Styrene / fiberglass - vinyl ester resin / lamination waste fiberglass

LC  
6/9/92

June 9, 1992

15

Water curtain

Paint filters

Metal - bending / assembly / painting

Lubricating oils

Major change in operations proportions from motorcycle helmets to bicycle helmets. Painting operations reduced significantly — some bike helmets have water-based coating, others done by vendors. No injection molding.

10:20 Looked at annual reports for transporters, TSD's, and quantities of hazardous wastes. Requested T&LP / Waste analyses.

10:35 Discussed non-hazardous waste streams.

10:50 Started facility tour.

Water curtain paint booths (3). & Satellite Drum area. No drum at time of USI.

11:05 Haz. Waste Storage Area.

empty drums on south.

45 drums paint sludge

12 drums of haz. waste acetone.

1 drum styrene

monomer waste  
(pool)

3-15-92 (7)

6-10-92 (1)

4-1-92 (1)

3-1-92 (2)

9-10-92 (1)

↓  
mistake

done on 4/1/92

ll  
6/9/92

June 9, 1992

'6

11:17 Foam building / waste polystyrene crusher & boxes.

11:25 UST area. Run off at facility to pond, ditches. Septic field.

11:30 End of facility walk-through - returned to conference room. Received

UST — 10,000 gallons Steel installed late 80's  
heating oil last used 1982

removed 6/15/1990 said clean — no release.  
but no documents.

Have a Safety-Kleen parts washer. Will write and tell us quantities of solvent generated.

11:50 Exit interview.

12:00 Left facility.

RL  
6/9/92

**ATTACHMENT D**

**PART A PERMIT APPLICATION**

FORM 1 GENERAL		ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER F I L D 0 7 5 6 1 1 5 2 5 3 D	
LABEL ITEMS		PLEASE PLACE LABEL IN THIS SPACE		GENERAL INSTRUCTIONS	
EPA I.D. NUMBER				If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
FACILITY NAME					
FACILITY MAILING ADDRESS					
FACILITY LOCATION					

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1	SKIP	V E T T E R C O R P O R A T I O N F A I R I N G S C O M P A N Y
---	------	---

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)	
2	S T O W E J A M E S S A F E T Y E N G I N E E R	2 1 7	8 9 3 9 3 0 0

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX		B. CITY OR TOWN		C. STATE	D. ZIP CODE
3	P O B O X 9 2 7	4	R A N T O U L	I L	6 1 8 6 6

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER		B. COUNTY NAME		C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
5	R T 1 3 6 2 M I L E S E A S T	6	C H A M P A I G N	6	I L	6 1 8 6 6	0 1 9

CONTINUED FROM THE FRONT

(IC CODES (4-digit, in order of priority))

A. FIRST

B. SECOND

3 0 7 9 (specify) Miscellaneous plastic products

(specify)

C. THIRD

D. FOURTH

(specify)

(specify)

OPERATOR INFORMATION

A. NAME

B. Is the name listed in Item VIII-A also the owner?

☒ YES ☐ NO

RICHARD BINET

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

D. PHONE (area code & no.)

FEDERAL M - PUBLIC (other than federal or state)  
STATE O - OTHER (specify)  
PRIVATE

P (specify)

2 1 7 8 9 3 9 3 0 0

E. STREET OR P.O. BOX

0 BOX 9 2 7

F. CITY OR TOWN

G. STATE

H. ZIP CODE

IX. INDIAN LAND

RANTOUL

IL

6 1 8 6 6

Is the facility located on Indian lands?

☐ YES ☒ NO

EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)

D. PSD (Air Emissions from Proposed Sources)

9 P

9 P

B. UIC (Underground Injection of Fluids)

E. OTHER (specify)

9 Z

1 1 9 8 1 7 A A E 8 1 0 1

(specify) Illinois Air Pollution Application - dry paint booth

C. RCRA (Hazardous Wastes)

E. OTHER (specify)

9 Z

1 1 9 8 1 7 A A E 8 1 0 4

(specify) Illinois Air Pollution Permit - wet paint booths

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9A/50

I. NATURE OF BUSINESS (provide a brief description)

Produce motorcycle accessory equipment (fairings & associated equipment)

F9A/51

III. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)

B. SIGNATURE

C. DATE SIGNED

Richard E. Binet President

*Richard E. Binet*

10/20/80

COMMENTS FOR OFFICIAL USE ONLY

C

**EPA**  
**HAZARDOUS WASTE PERMIT APPLICATION**  
Consolidated Permits Program  
(This information is required under Section 3005 of RCRA.)

1. EPA I.D. NUMBER  
I L D 0 7 5 6 1 1 5 2 5 3 1

**OFFICIAL USE ONLY**  
APPLICATION APPROVED  
DATE RECEIVED (yr., mo., & day)  
23 24 25 26 27 28 29

COMMENTS

**FIRST OR REVISED APPLICATION**

Enter an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's I.D. Number in Item 1 above.

**FIRST APPLICATION** (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

YR. MO. DAY  
7 2 0 6 1 5

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

YR. MO. DAY  
22 24 25 26 27 28

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

**REVISED APPLICATION** (place an "X" below and complete item 1 above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

**PROCESSES - CODES AND DESIGN CAPACITIES**

**PROCESS CODE** - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

**1. PROCESS DESIGN CAPACITY** - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<b>Storage:</b>		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
<b>Disposal:</b>		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<b>Treatment:</b>		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

**EXAMPLE FOR COMPLETING ITEM III** (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

DUP

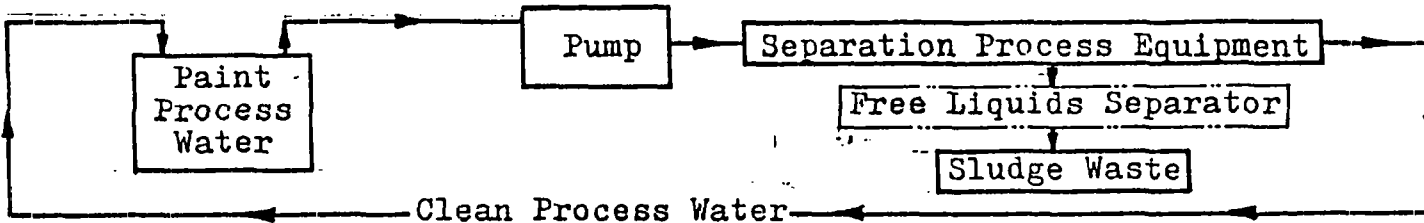
LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)			1. AMOUNT	2. UNIT OF MEASURE (enter code)
X-1	S 0 2	600	G	5			
X-2	T 0 3	20	E	6			
1	S 0 1	23,333	G	7			
2				8			
3				9			
4				10			

# PROCESSES (continued)

SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

It is the intent of this corporation to design and install a handling process that would permit the separation of paint sludges from our paint pit process water. The implementation of a process as described above would reduce the volume of waste to be disposed by recycling the process water in the "closed loop" system.

The process diagram would be as shown below:



The equipment to be used in this process has not yet been specified due to research on the best equipment available to eliminate "free liquids" in the sludge waste. If "free liquids" cannot be removed in the separation process to the desired extent, an additional free liquids removal step would have to be added to the process.

## DESCRIPTION OF HAZARDOUS WASTES

**A. EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

**B. ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

**C. UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE  
POUNDS.....P  
TONS.....T

METRIC UNIT OF MEASURE CODE  
KILOGRAMS.....K  
METRIC TONS.....M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

## PROCESSES

### 1. PROCESS CODES:

**For listed hazardous waste:** For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

**For non-listed hazardous wastes:** For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

**Note:** Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

### 2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below)** — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES			
				1. PROCESS CODES (enter)			2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3	D 8 0		
X-2	D 0 0 2	400	P	T 0 3	D 8 0		
X-3	D 0 0 1	100	P	T 0 3	D 8 0		
X-4	D 0 0 2						included with above



**CONTINUE ON REVERSE**

DESCRIPTION OF HAZARDOUS WASTES (continued)

USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

L D 0 7 5 6 1 1 5 2 5 3 6

FACILITY DRAWING

Existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

PHOTOGRAPHS

Existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

4 0 1 8 4 4 0

LONGITUDE (degrees, minutes, & seconds)

0 8 8 0 5 5 3 0

FACILITY OWNER

A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

Richard E. Binet

B. SIGNATURE

*Richard E. Binet*

C. DATE SIGNED

8/20/80

OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

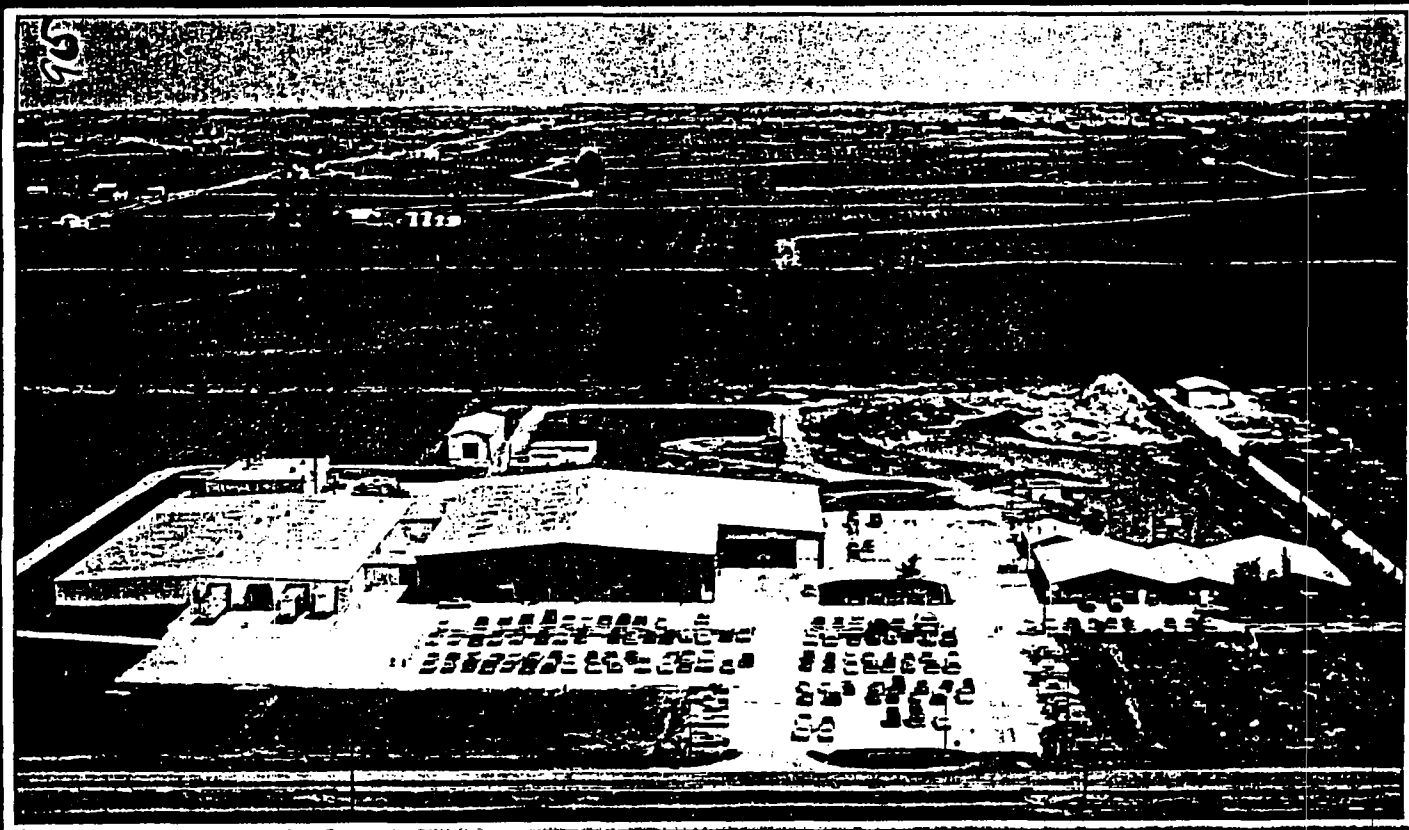


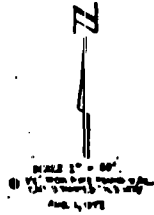
Vetter Corporation, Rantoul, Illinois 61866 217/893-9300

### Vetter Property Description

TRACT I: Commencing at the Southwest corner of the Southwest Quarter of Section 32, Township 22 North, Range 10 East of the Third Principal Meridian, Champaign County, Illinois, thence North 89 degrees 45 minutes 17 seconds East along the South line of the Southwest Quarter of said Section 32, 1322.42 feet for a true place of beginning; thence North 00 degrees 12 minutes 33 seconds West, 1272.21 feet to the Southerly right-of-way line of the Illinois Central Railroad; thence North 89 degrees 40 minutes 37 seconds East along the Southerly right-of-way line of the Illinois Central Railroad, 308.12 feet; thence South 00 degrees 12 minutes 33 seconds East, 1272.54 feet to the South line of the Southwest Quarter of said Section 32; thence South 89 degrees 45 minutes 17 seconds West along the South line of the Southwest Quarter of said Section 32, 308.12 feet, more or less to the place of beginning, said tract containing 9.00 acres, more or less, all situated in Champaign County, Illinois.

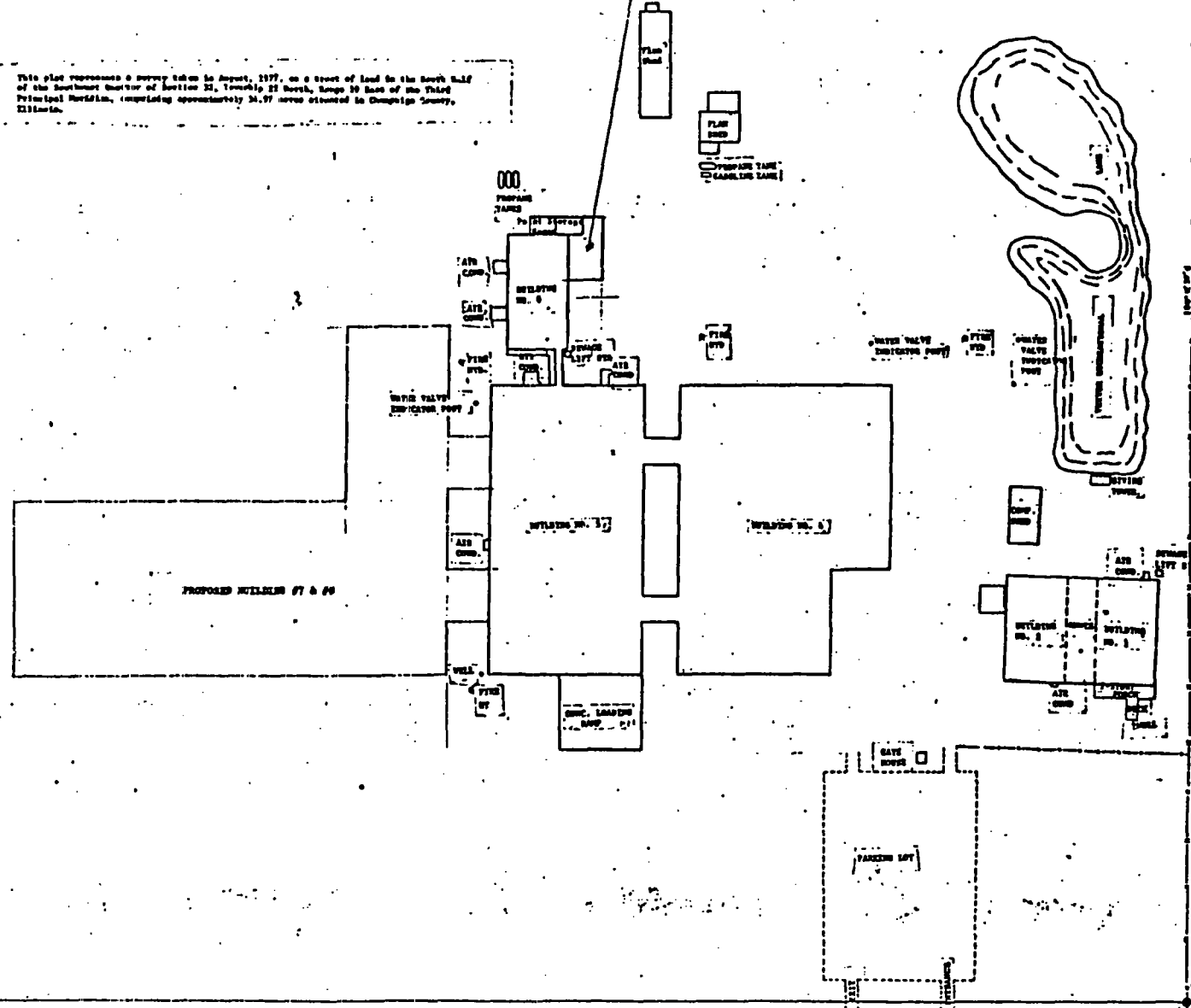
TRACT II: Commencing at the Southwest corner of the SW $\frac{1}{4}$  of Section 32, Township 22 North, Range 10 East of the 3rd Principal Meridian, Champaign County, Illinois; thence North 89 degrees 45 minutes 17 seconds East along the South line of the SW $\frac{1}{4}$  of Section 32, 432.83 feet for a true place of beginning; thence North 00 degrees 21 minutes 03 seconds West parallel with the West line of the SW $\frac{1}{4}$  of said Section 32, 1270.80 feet to the Southerly right-of-way line of the Illinois Central Gulf Railroad; thence North 89 degrees 40 minutes 37 seconds East along the Southerly right-of-way line of said Illinois Central Gulf Railroad; thence 892.67 feet South 00 degrees 12 minutes 33 seconds East parallel with the East line of the SW $\frac{1}{4}$  of said Section 32, 1272.21 feet to the South line of the SW $\frac{1}{4}$  of said Section 32; thence South 89 degrees 45 minutes 17 seconds West along the South line of the SW $\frac{1}{4}$  of said Section 32, 889.59 feet, more or less, to the place of beginning, said tract containing 25.97 acres, more or less, all situated in Champaign County, Illinois.





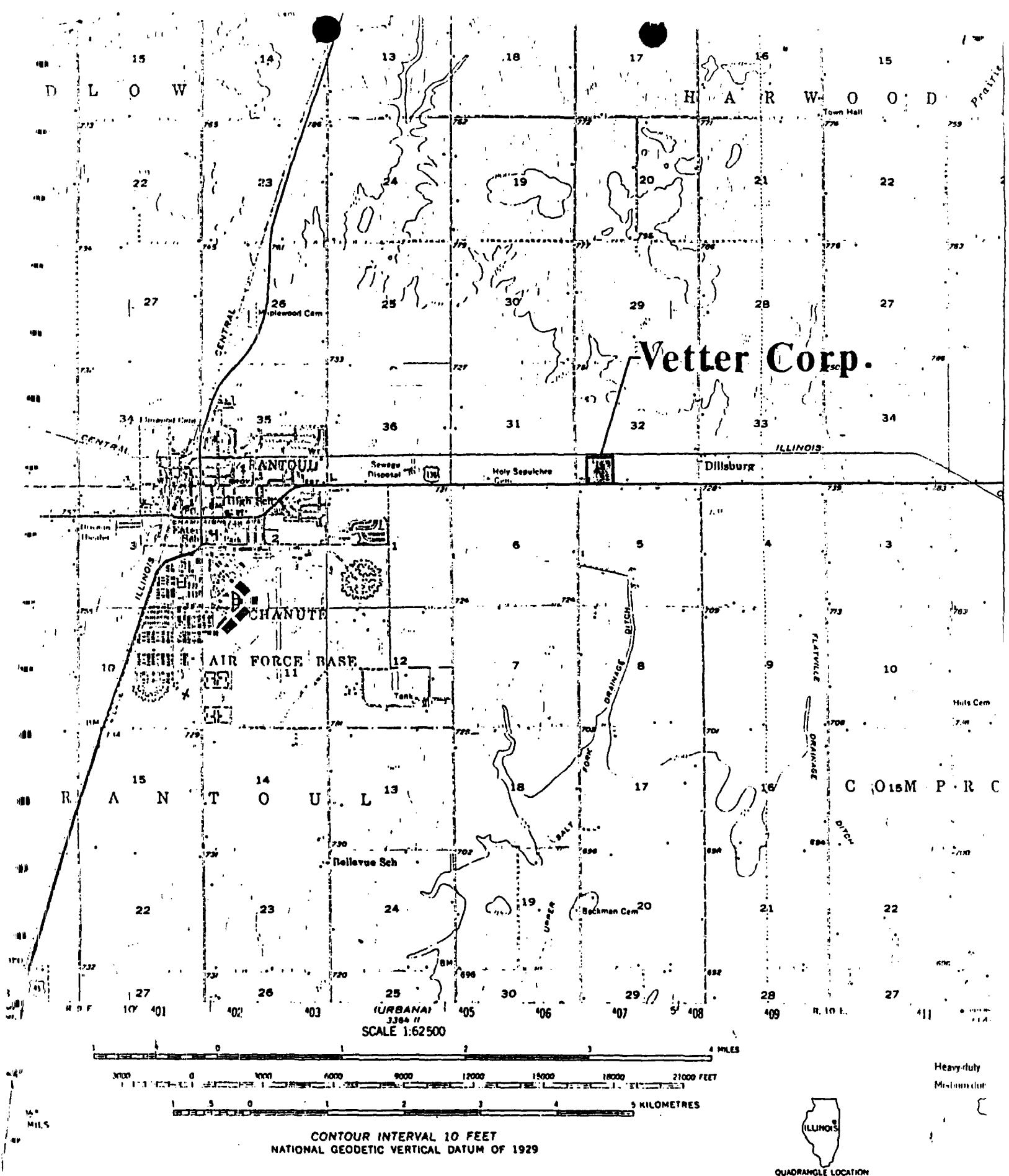
PROPOSED BARREL STORAGE AREA  
APPROX. 33 ft. x 60 ft.  
1680 SQ. FT.

This plot represents a survey taken in August, 1977, on a tract of land in the South half of the Southwest Quarter of Section 21, Township 22 North, Range 10 East of the Third Principal Meridian, comprising approximately 34.97 acres situated in Champaign County, Illinois.



 Vetter Fairing Co.

VETTER FAIRING CO.



FOR SALE BY U.S. GEOLOGICAL SURVEY, RESTON, VIRGINIA 22092  
 AND BY THE STATE GEOLOGICAL SURVEY, URBANA, ILLINOIS 61801  
 A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST